

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

MBIA INC.,

:

Plaintiff,

:

Case No. 08 cv 4313 (RMB/DFE)

-against-

:

UNOPPOSED MOTION TO
ADMIT COUNSEL *PRO HAC VICE*

FEDERAL INSURANCE COMPANY and
ACE AMERICAN INSURANCE COMPANY,

:

:

Defendants.

:

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PURSUANT TO RULE 1.3(c) of the Local Rules of United States District Courts
for the Southern and Eastern Districts of New York, I, Amory Donelly, a member in good
standing the bar of this Court, hereby move for an Order allowing the admission *pro hac*
vice of :

LARA DEGENHART
Howrey LLP
1299 Pennsylvania Ave., NW
Washington, DC 20004
202.783.0800 (tel.)
202.383.6610 (fax)

Lara Degenhart is a member of good standing of the Bar of the State of South Carolina
and the District of Columbia. There are no pending disciplinary proceedings against Ms.
Degenhart in any State or Federal Court.

Dated: New York, New York
June 11, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Amory W. Donnelly", written over a horizontal line.

Amory W. Donnelly

HOWREY LLP

Citigroup Center

153 East 53rd Street, 54th Floor

New York, New York 10022

(212) 896-6500 (tel.)

(914) 462-3280 (fax)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

MBIA INC., :

Plaintiff, :

Case No. 08 cv 4313 (RMB/DFE)

-against- :

AFFIDAVIT OF AMORY W. DONELLY
IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE*

FEDERAL INSURANCE COMPANY and :
ACE AMERICAN INSURANCE COMPANY,

ADMIT COUNSEL *PRO HAC VICE*

Defendants.

-----X

[illegible]

AMORY W. DONELLY, being duly sworn, hereby deposes and says as follows:

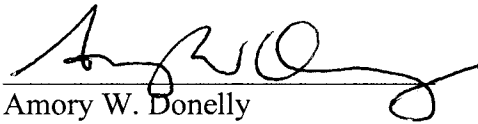
1. I am associated with Howrey LLP, counsel for plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Lara Degenhart as counsel *pro hac vice* to represent plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on February 27, 2008. I am also admitted in the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing with these Courts. (See Exhibits A & B annexed hereto).
3. I have known Lara Degenhart since 2006.
4. Ms. Degenhart is a member of Howrey LLP in Washington D.C.
5. She is a member of good standing of the Bars of the State of South Carolina and the District of Columbia. (See Exhibits A & B annexed hereto)
5. I have found Ms. Degenhart to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Ms. Degenhart, *pro hac vice*

7. This motion is unopposed. True and accurate copies of emails from opposing counsel consenting to Ms. Degenhart's admission *pro hac vice* are attached as Exhibits C and D.
8. I respectfully submit a proposed order granting the admission of Lara Degenhart, *pro hac vice*, which is attached as Exhibit E.

WHEREFORE, I respectfully request that the motion to admit Lara Degenhart, *pro hac vice*, to represented plaintiff in the above-captioned matter be granted.

Dated: New York, New York
June 11, 2008

Respectfully submitted,



Amory W. Donnelly
HOWREY LLP
Citigroup Center
153 East 53rd Street, 54th Floor
New York, New York 10022
(212) 896-6500 (tel.)
(914) 462-3280 (fax)

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that Lara Anne Degenhart was duly sworn and admitted as an attorney in this state on November 18, 1992, and is currently an active member of the South Carolina Bar.

DANIEL E. SHEAROUSE, CLERK

BY *Brenda J. Healy*
CHIEF DEPUTY CLERK

Columbia, South Carolina

June 6, 2008



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

LARA A. DEGENHART

was on the 6TH day of FEBRUARY, 1995

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June 6,
2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

Donelly, Amory

From: Davis, Christine
Sent: Tuesday, June 10, 2008 3:10 PM
To: Donelly, Amory
Subject: FW: Consent to file pro hac motions

From: Joaquin, Alan J. [mailto:Alan.Joaquin@dbr.com]
Sent: Tuesday, June 10, 2008 3:09 PM
To: Davis, Christine
Subject: Re: Consent to file pro hac motions

ACE consents.

----- Original Message -----

From: Davis, Christine <DavisChristine@howrey.com>
To: Joaquin, Alan J.; Bonanno, Lisa R. <LRBonanno@HHLAW.com>
Sent: Tue Jun 10 15:06:52 2008
Subject: Consent to file pro hac motions

Alan and Lisa,

As per my voice mail, I am writing to seek your consent to our filing pro hac motions in S.D.N.Y. for Lara Degenhart, Robert Jacobs, and Christine Davis in the MBIA matter. Please respond to this email if you are willing to consent to our filing of these motions.

Thank you.

Regards,
Christine

Christine Spinella Davis
Howrey LLP
1299 Pennsylvania Avenue, NW
Washington, DC 20004
www.howrey.com
202.383.6768 (ph)
202.383.6610 (f)
daviscs@howrey.com

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6/11/2008

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Donelly, Amory

From: Davis, Christine
Sent: Wednesday, June 11, 2008 10:10 AM
To: Donelly, Amory
Cc: Jacobs, Robert; D'Andrea, Kristin
Subject: FW: Consent to file pro hac motions

From: Bonanno, Lisa R. [mailto:LRBonanno@HHLAW.com]
Sent: Wednesday, June 11, 2008 10:08 AM
To: Davis, Christine; _Alan Joaquin
Cc: _David J. Hensler; Zaetta, Christopher R.
Subject: RE: Consent to file pro hac motions

Christine:

As we discussed, we agree to consent to the filing of your pro hac motions provided that you consent to our filing similar motions. I understand from our discussion that you consent to our filing of pro hac motions in the MBIA matter and we therefore consent to your pro hac motions. Call me if you have any questions. Thank you.

Lisa

From: Davis, Christine [mailto:DavisChristine@howrey.com]
Sent: Tuesday, June 10, 2008 3:07 PM
To: alan.joaquin@dbi.com; Bonanno, Lisa R.
Subject: Consent to file pro hac motions

Alan and Lisa,

As per my voice mail, I am writing to seek your consent to our filing pro hac motions in S.D.N.Y. for Lara Degenhart, Robert Jacobs, and Christine Davis in the MBIA matter. Please respond to this email if you are willing to consent to our filing of these motions.

Thank you.

Regards,
Christine

Christine Spinella Davis
Howrey LLP
1299 Pennsylvania Avenue, NW
Washington, DC 20004
www.howrey.com
202.383.6768 (ph)
202.383.6610 (f)
daviscs@howrey.com

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"EMF <HHHLAW.COM>" made the following annotations.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MBIA INC.,

:

Plaintiff,

:

Case No. 08 cv 4313 (RMB/DFE)

-against-

:

ORDER FOR ADMISSION *PRO HAC VICE*

FEDERAL INSURANCE COMPANY and
ACE AMERICAN INSURANCE COMPANY,

:

ON WRITTEN MOTION

•

Defendants.

• •

-----X

Upon the motion of Amory W. Donelly attorney for Plaintiff MBIA INC. and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Lara Degenhart
Howrey LLP
1299 Pennsylvania Ave., NW
Washington, DC 20004
202.783.0800 (tel.)
202.383.6610 (fax)

is admitted to practice *pro hac vice* to represent MBIA INC. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

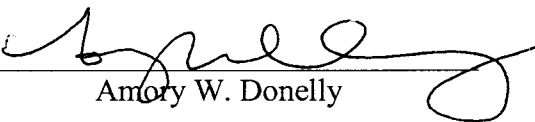
Dated: New York, New York
June __, 2008

Hon. Douglas F. Eaton
United States Magistrate Judge

The undersigned hereby certifies that a true and accurate copy of the preceding documents was sent in the manner described below to the following attorneys on this 11th day of June 2008.

David J. Hensler
Lisa R. Bonanno
Hogan & Hartson LLP
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202.637.5600
DJHensler@hhlaw.com
LRBonanno@hhlaw.com
BY REGULAR MAIL
Attorneys for Defendant
Federal Insurance Company

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Attorneys for Defendant
Ace American Insurance Company


Amory W. Donelly

